

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
KATHLEEN P. MULLINIX,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 04-12684-WGY
	)	
KIKI BOGORAD-GROSS and	)	
LEONARD P. BOGORAD, as They	)	
Are Executors of the Will of	)	
Lawrence Bogorad,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' MOTION TO UNDESIGNATE AS CONFIDENTIAL  
DOCUMENTS COOP 00031-32, COOP 00050-53, AND COOP 00054**

Pursuant to Paragraphs 2(f) and 17 of the Protective Order, as modified by this Court on March 7, 2006, Defendants Leonard Bogorad and Kiki Bogorad-Gross, as Executors of the Will of Lawrence Bogorad (collectively, "Defendants"), by their attorneys, Sullivan & Worcester LLP, hereby challenge and request the Court to remove the confidentiality designation of documents COOP 00031-32, COOP 00050-53 and COOP 00054 ("Documents") in order to file them with Defendants' anticipated reply brief to Plaintiff's opposition to Defendants' motion for Summary Judgment. This motion is filed simultaneously with Defendants' Motion for summary judgment so that the Documents, which are material to the defense against Plaintiff's meritless claims, may be filed with the Defendants' reply brief to Plaintiff's anticipated opposition to Defendants' Motion for Summary Judgment.

KIKI BOGORAD-GROSS and  
LEONARD P. BOGORAD, as  
they are the Executors of the Will  
of Lawrence Bogorad,

By their attorneys,

May 25, 2006

/s/ Lisa M. Hodes  
Larry L. Varn (BBO # 508130)  
Lisa M. Hodes (BBO # 660444)  
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**FEDERAL RULE 26(c) AND LOCAL RULES 7.1(A)(2) AND 37.1 CERTIFICATE**

Counsel for Defendants has made a good-faith effort to resolve this dispute without court action. Counsel for Defendants and counsel for Plaintiff have exchanged emails and have held multiple phone conferences, but have been unable to reach agreement.

/s/ Lisa M. Hodes

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 25, 2006.

/s/ Lisa M. Hodes